## **EXHIBIT 8**

Declaration of Litigation Support Specialist Tashieka Taylor dated March 9, 2021

1	Danielle E. Karst (D.C. Bar No. 481881) Timothy J. Mulreany (Maryland Bar No. 8812160123)								
$\begin{bmatrix} 2 \\ 3 \end{bmatrix}$	COMMODITY FUTURES TRADING COMMISSION Three Lafayette Centre								
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7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA								
8	DISTRICT OF REVIDER								
9	COMMODITY FUTURES TRADING COMMISSION,	Case No. 2:19-cv-1697-JAD-DJA							
10	Plaintiff,	DECLARATION OF TASHIEKA TAYLOR IN SUPPORT OF THE CFTC'S REPLY							
11	v.	MEMORANDUM IN SUPPORT OF ITS THIRD MOTION FOR AN ORDER TO							
12	DAVID GILBERT SAFFRON a/k/a DAVID GILBERT and	SHOW CAUSE AS TO WHY DEFENDANTS SHOULD NOT BE HELD							
13	CIRCLE SOCIETY, CORP.,	IN CIVIL CONTEMPT FOR VIOLATIONS OF THE COURT'S ASSET							
15	Defendants.	FREEZE							
16		I							
17	I, Tashieka Taylor, hereby declare as follows:								
18	I. <u>INTRODUCTION</u>								
19	1. I have worked as a contractor since 2006 and have been assigned as a Litigation Support								
20	Specialist ("LSS") for Plaintiff Commodity Futures Trading Commission ("Plaintiff" or								
21	"CFTC") since August 2010. Prior to joining the CFTC, I was assigned as an LSS for the U.S.								
22	Department of Justice-Commercial Litigation Branch. I have a Bachelor of Science in Computer								
23   24	Science from the University of Maryland Eastern Shore.								
25	2. I was asked to assist in the litigation of David Gilbert Saffron ("Saffron") and Circle								
26	Society, Corp. ("Circle Society") (collectively, "Defendants").								
27	Concentration of the society (concentration)	1011umitio ).							
28	1								

- 3. I have personal knowledge of the following facts and, if called as a witness, could and would testify competently thereto.
- 4. I submit this Declaration pursuant to 28 U.S.C. § 1746, in support of the CFTC's Reply Memorandum in Support of its Third Motion for an Order to Show Cause as to Defendants.

#### II. <u>SUMMARY</u>

- 5. On or about February 25, 2021, I was asked by CFTC staff to prepare and bates label a set of electronic, third-party subpoena documents (the "documents") which were to be produced to Defendants' Counsel.
- 6. On March 1, 2021, I uploaded two zip files containing a total of 506 documents to the CFTC's secure file transfer protocol site (the "FTP site"). I placed the zip files in a folder entitled "CFTC Production to Counsel" for ease of reference, and the files were password protected. On the same day, I informed CFTC staff that the production of documents to Defendants' Counsel was completed.
- 7. On the morning of March 3, 2021, I was informed by CFTC staff that Defendants' Counsel claimed that the FTP site "provided on March 1 contained no documents, only an empty folder." Prior to March 3, 2021, I never received any communication from CFTC staff or Defendants' Counsel stating that Defendants' Counsel could not open the files uploaded to the FTP site, or that the folder was empty. The first time I learned of this issue was on March 3, 2021, when CFTC staff asked me to confirm that the FTP site contained the documents.

#### III. ANALYSIS

8. On March 3, 2021, I accessed the FTP site, where I was able to confirm that the folder entitled "CFTC Production to Counsel" was not empty and in fact did contain the documents previously uploaded.

9. On March 3, 2021, I requested that the CFTC's Office of Data Technology ("ODT") research whether any external party had accessed the FTP site or the documents I uploaded. ODT provided a report of transfer activity related to the FTP credentials associated with the username and password provided to Defendants' Counsel. 10. On March 3, 2021, I received the requested report from ODT ("ODT Report"), attached as Exhibit A to this Declaration, which revealed the following: a. The documents were uploaded to the FTP site on March 1, 2021, as reflected by the CFTC IP address noted in the ODT Report (i.e., 172.20.114). b. Based on the ODT Report, no external party accessed the FTP site until March 3, 2021. See ODT Report (showing multiple log-ins on March 3, 2021, with non-CFTC IP address 174.68.153). I declare under penalty of perjury that the foregoing is true and correct. Tashiska Taylor Tashieka Taylor Litigation Support Specialist Executed in Washington, D.C. on March 9, 2021. 

# **EXHIBIT A**

**ODT** Report



### **Activity - By User (Detailed)**

3/4/2021 9:35:05 AM Description: Report detailing all folder and file create and delete activity for a specifc user, grouped by username, and sorted by date in reverse chronological order.

Date/Time	Remote IP	Protocol	Action	File Name	Folder	B Trasferred	Result			
User Name: RKFRHZJBZE										
3/3/2021 11:45:21 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1,044,615.2	200			
3/3/2021 11:38:51 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1,044,615.2	200			
3/3/2021 11:14:04 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 002.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	883.23	200			
3/3/2021 10:56:52 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 002.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	883.20	200			
3/1/2021 6:34:05 PM	172.20.114.83	HTTPS	created	03-01-2021 CFTC PROD 002.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	881.99	200			
3/1/2021 10:50:34 AM	172.20.114.89	HTTPS	created		/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1,044,614.0	200			
3/1/2021 10:35:29 AM	172.20.114.89	HTTPS	dele		/EFTAdhoc/RKFRHZJBZE/Counsel Production t CFTC/	1.27	200			
3/1/2021 10:34:28 AM	172.20.114.89	HTTPS	created		/EFTAdhoc/RKFRHZJBZE/Counsel Production t CFTC/	2,433.54	400			
3/1/2021 10:33:54 AM	172.20.114.89	HTTPS	created			182,465.43	400			
2/25/2021 3:11:33 PM	172.20.114.73	HTTPS	mkd		/EFTAdhoc/RKFRHZJBZE/Counsel Production t	1.27	200			
2/25/2021 3:11:18 PM	172.20.114.73	HTTPS	mkd		/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1.27	200			

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